

DALLAS GARCIA, <i>Individually</i>, and as a representative of the estate of FRED HARRIS, deceased,)(Civil Action No. 4:22cv3093
)((Jury Trial)
)(
<i>Plaintiff,</i>)(
)(
V.)(
)(
HARRIS COUNTY, TX, and HARRIS COUNTY SHERIFF’S OFFICE,)(
)(
<i>Defendants.</i>)(

TO: DEFENDANTS HARRIS COUNTY and HARRIS COUNTY SHERIFF'S
OFFICE, c/o Jennifer Callan, Assistant County Attorney, 1019 Congress Avenue,
Houston, Texas 77002

A. Persons Likely to Have Discoverable Information that May be Used to Support Claims or Defenses (Rule 26(a)(1)(A)(i)):

Babbs, Lashonda, c/o Randall Kallinen and Alexander Johnson, Kallinen Law, PLLC, 511 Broadway Street, Houston, TX 77012 (713-320-3785). Aunt of Fred Harris who is expected to testify about her nephew's injuries and damages that resulted from the alleged misconduct of the County and the suffering of Plaintiff and other relevant facts.

Plaintiff's Initial Disclosures

Ellison, S., Texas Department of Public Safety-Texas Ranges Division, 12230 West Road, Houston, Texas 77065 (281-517-1400). May have knowledge of the criminal investigation of the assault on Freddy Harris as recorded in Report #2021I-TRA-50080441.

Garcia, Asa, c/o Randall Kallinen and Alexander Johnson, Kallinen Law, PLLC, 511 Broadway Street, Houston, TX 77012 (713-320-3785). Sister of Fred Harris who is expected to testify about her brother's injuries and damages that resulted from the alleged misconduct of the County and the suffering of Plaintiff and other relevant facts.

Garcia, Dallas, c/o Randall Kallinen and Alexander Johnson, Kallinen Law, PLLC, 511 Broadway Street, Houston, TX 77012 (713-320-3785). Plaintiff who is expected to testify about her son, Fred Harris' injuries and damages that resulted from the alleged misconduct of the County as well as concerning her communications with Harris County and other relevant facts.

Gustartis, Evan, 11415 E. Gables Drive, Richmond, Texas 77406 (832-725-0667). Defendant alleges may have knowledge of Fred Harris' arrest in October 2021 as record in HPD Offense Report #136767721.

Hughey, James (address and phone unknown). Inmate who may have knowledge of the events at issue in this lawsuit.

Laposata, Michael, M.D., University of Texas Medical Branch, 301 University Blvd., Galveston, Texas 77555 (409-772-0090). May have knowledge of Fred Harris' medical condition and/or injuries at the time in question.

Laster, W., Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). Defendants assert may have knowledge of Fred Harris' arrest in October 2021 and/or his demeanor as recorded in HPD-Offense Report #136767721.

Narcisse, Alex (address and phone unknown). Inmate who may have knowledge of the events at issue in this lawsuit.

Nguyan, Dong (address and phone unknown). Inmate who may have knowledge of the events at issue in this lawsuit.

Owles, L., Texas Department of Public Safety-Texas Ranges Division, 12230 West Road, Houston, Texas 77065 (281-517-1400). May have knowledge of the criminal investigation of the assault on Fred Harris as recorded in Report #2021I-TRA-50080441.

Ownby, Michael (SPN 2991412), Harris County Sheriff's Office Detention Facility, 701 N. San Jacinto, Houston, Texas 77002 (current inmate-no phone). Murdered Fred Harris and is aware of the facts of the murder of Fred Harris as well as his other crimes and as to the facts of his stay in the Harris County jail and events leading up to the murder.

Romo, R., Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). Defendant alleges may have knowledge of Fred Harris' arrest in October 2021 and/or his demeanor as recorded in HPD-Offense Report #136767721.

Saltzman, Skylar, 1823 9th Street, Lake Charles, Louisiana 70601 (832-475-1568). Defendant allege may have knowledge of Fred Harris' arrest in October 2021 as record in HPD Offense Report #136767721.

Sanchez, Justin, Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-8843131). Defendant alleges may have knowledge of Fred Harris' arrest in October 2021 and/or his demeanor as recorded in HPD-Offense Report #136767721.

Smith, Sarah, Houston Fire Department, 500 Jefferson, 19th Floor or 1801 Smith Street, Suite 860, Houston, Texas 77002 (832-394-6860). May have knowledge of Fred Harris' medical condition and/or injuries and the medical care provided to him at the time in question, as recorded in HFD-Patient Care Report Incident #2110291094.

Tek, V., Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). Defendant alleges may have knowledge of Fred Harris' arrest in October 2021 and/or his demeanor as recorded in HPD-Offense Report #136767721.

Trejo, J. Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). Defendants allege may have knowledge of Fred Harris' arrest in October 2021 and/or his demeanor as recorded in HPD-Offense Report #136767721.

Unknown staff, employees, representatives, agents, personnel and custodian of records for Houston Fire Department, 500 Jefferson, 19th Floor or 1801 Smith Street, Suite 860, Houston, Texas 77002 (832-394-6860). May have knowledge of Fred Harris' medical condition and/or injuries and the medical care provided to him at the time in question, as recorded in HFD Patient Care Report Incident #2110291094.

Unknown staff, employees, representatives, agents, personnel and custodian of records for Houston Police Department, 1200 Travis, Houston, Texas 77002 (713-884-3131). May have knowledge of Fred Harris' arrest in October 2021 and/or his demeanor as recorded in HPD Offense Report #136767721.

Unknown staff, employees, representatives, agents, personnel and custodia of records for Texas Department of Public Safety-Texas Ranges Division, 12230 West Road, Houston, Texas 77065 (281-517-1400). May have knowledge of the criminal investigation of the assault on Freddy Harris as recorded in Report #2021I-TRA-50080441.

Unknown staff, employees, representatives, agents, personnel and custodian of records for The Harris Center for Mental Health & IDD (f/k/a MHMRA), 3737 Dacoma, Houston, Texas 77092 (713-970-7000). Defendant alleges may have knowledge of Fred Harris' mental health history prior to the events at issue in this lawsuit.

Unknown staff, employees, representatives, agents, personnel and custodian of records for University of Texas Medical Branch, 301 University Blvd., Galveston, Texas 77555 (409-2667542). May have knowledge of Fred Harris' medical condition and/or injuries at the time in question.

Unknown staff, employees, representatives, agents, personnel and custodian of records for White Oaks Hospital, 6500 Hornwood Drive, Houston, Texas 77074 (713-995-0909). Defendant alleges may have knowledge of Fred Harris' mental health history prior to the events at issue in this lawsuit.

Vasquez, Francisco (address and phone unknown). Inmate who may have knowledge of the events at issue in this lawsuit.

Randall Kallinen and Alexander Johnson, Kallinen Law, PLLC, 511 Broadway Street, Houston, TX 77012 (713-320-3785). Have knowledge of attorney fees, expenses, and notice letters and other facts.

DEFENDANT alleges all of the below listed individuals are uniformed personnel or civilian employees of the Harris County, and pursuant to Chapter 552 *et seq.*, Texas Government Code, the home address, home telephone numbers, personal identifying information and information on family members will not be disclosed. See Tex. Gov't Code §§552.102, 552.117, 552.1175, & 557.108(a)(2). Arrangements to either contact or take depositions of any of the below listed individuals should be made by contacting the following attorney of record in this case: Ms. Jennifer Callan, Assistant County Attorney, Harris County Attorney's Office, 1019 Congress Street, Houston, Texas (713-274-5146).

Alatise, J., RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Al-Hadad, Sudad Kareem, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Former Medical director of HCSO Health Services who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of HCSO jail medical personnel is constitutionally

sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Allen, Madeline, MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Arlan, (first name unknown), HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Beard, Brittney, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Becker, Charles, M.D., Ben Taub Hospital (a/k/a Harris Health System), 1504 Taub Loop, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). May have knowledge of Fred Harris' medical condition and/or injuries and the medical care provided to him at the time in question.

Beltran, John, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Deputy who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021.

Bosquez, P., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO Major who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit. He may offer opinions regarding the actions of detention officer at the time in question. He may offer opinions that HCSO and Harris County do not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including Fred Harris. He may offer an opinion that no policy,

custom or practice of Harris County or HCSO was the moving force behind nor the actual cause of the injuries to Fred Harris and that the training, supervision and discipline of HCSO officers is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

Brezik, B., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Brightman, D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Brown, Christopher, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Brown, J., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). HCSO-Homicide sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Brown, Lethomas, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Buccini, Bryan, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). HCSO Lieutenant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports

relating to the events at issue in this lawsuit. He may offer opinions regarding the actions of detention officer at the time in question. He may offer opinions that HCSO and Harris County do not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including Fred Harris. He may offer an opinion that no policy, custom or practice of Harris County or HCSO was the moving force behind nor the actual cause of the injuries to Fred Harris and that the training, supervision and discipline of HCSO officers is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

Burkeen, P., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). HCSO investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Campbell, Trina, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Carter, Audrey, Harris County Institute of Forensic Sciences ("HCIFS"), 1861 Old Spanish Trail, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). Medical examiner employee who may testify about her background, education, training, employment history, job duties and responsibilities with HCIFS, as well as her knowledge, if any, of the autopsy performed on Fred Harris, as recorded in Report #ML21-5126.

Casillas, Gaston, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Chukwuocha, Ezinne, NP, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education,

training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Colunga, Paul, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer with HCSO Classification Division who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Cruz, Jovanny, M.D., Ben Taub Hospital (a/k/a Harris Health System), 1504 Taub Loop, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). May have knowledge of Fred Harris' medical condition and/or injuries and the medical care provided to him at the time in question.

Dasi, Charles, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Davis, C., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Deputy who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Davis, T.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

DellaSala, D. HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Delone, Edward, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Medical administrator with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Dexter, Janel, LPHA-intern, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Don, David, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical records clerk who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, as well as his knowledge, if any, of Fred Harris' medical history as stated in his medical file.

Doss, A., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Drawdy, Stephen, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Detention sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Duke, Alyssa, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris

and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Ekpo, Cecilia, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Finch, G., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO Medical Operations deputy who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Flores, D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Gamboa, Jessica, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Gamez, Samuel, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Gant-Johnson, Paige, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris

and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Gates, (first name unknown), Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Jennifer Callan: 713-2745146). HCDA Investigator who may have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit under HCSO Offense Report #211012021 and Texas Rangers Report #2021I-TRA-50080441 as well as indictment #s 174561801010 and 174680501010.

Gearing, Dominikka, MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Gemher, (first name unknown), RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Gibson, William, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Detention officer with HCSO Classification Division who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Giboyeaux, William, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Gill, S., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). HCSO sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation

relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Gonzales, H., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Green, Sharika, MA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Guzman, Nicolas, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Handley, (first name unknown), Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Jennifer Callan: 713-2745146). HCDA Investigator who may have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit under HPD Offense Report #1367677-21 and indictment #174311801010.

Haynes, A., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). HCSO-Records Division sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

He, Emily, LPHA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Hessel, J., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Holcombe, J., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Hudson, C.J., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Hughes, Cleo, RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Hughes, Tammy, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Radiology technician who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Ikomuanya, Osinachi, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical

standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Johnson, Demitre, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Kaminsky, Stephen, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Radiologist who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Katrib, B., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO Lieutenant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit. He may offer opinions regarding the actions of detention officer at the time in question. He may offer opinions that HCSO and Harris County do not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including Fred Harris. He may offer an opinion that no policy, custom or practice of Harris County or HCSO was the moving force behind nor the actual cause of the injuries to Fred Harris and that the training, supervision and discipline of HCSO officers is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

Kazakevich, Natalia, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. She may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical standard of care. She may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of

HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Kroeger, Toby, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). HCSO Captain who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit. He may offer opinions regarding the actions of detention officer at the time in question. He may offer opinions that HCSO and Harris County do not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including Fred Harris. He may offer an opinion that no policy, custom or practice of Harris County or HCSO was the moving force behind nor the actual cause of the injuries to Fred Harris and that the training, supervision and discipline of HCSO officers is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

LeBlanc, Wendy, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Lerma, J.A., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Deputy who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Lopez, Lorena, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Lusk, T., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Madu, Catherine, FNP, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Martin, Katon, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Mathew, Manesh, Rph, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Pharmacist who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Plaintiff and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Plaintiff during his incarceration at Harris County jail.

McGee, Christine, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). A custodian of records for HCSO who is expected to testify that HCSO Offense Report #2110-12021, HCSO jail inmate files, HCSO IAD file #DIC2021-00026 and HCSO jail medical records relating to Fred Harris and/or Michael Ownby, including but not limited to all reports, supplemental reports, witness statements, investigation supplements, videos, audio recordings, medical reports, medical notes and all other records, documents or media contained in said files are business records and records of regularly conducted activity within the meaning of the Federal Rules of Evidence.

McKiver, Jarin, Harris County Institute of Forensic Sciences (“HCIFS”), 1861 Old Spanish Trail, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). Medical examiner employee who may testify about her background, education, training, employment history, job duties and responsibilities with HCIFS, as well as her knowledge, if any, of the autopsy performed on Fred Harris, as recorded in Report #ML21-5126.

Molina, Roxanne, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Psychiatric technician who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of

the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Nelson, Korrina, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical records clerk who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, as well as her knowledge, if any, of Fred Harris' medical history as stated in his medical file.

Newman, D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Former Nursing Director of HCSO Health Services who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Ngemhe, Marthe, RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Odunuga, Adetona, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO Medical officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and the initial medical screening of Fred Harris upon his booking into a Harris County jail.

Oji, Chikodili, RN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Okereke, Ogechukwu, NP, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Osiminibeke, Ezihuo, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Patel, Rajan, M.D., Ben Taub Hospital (a/k/a Harris Health System), 1504 Taub Loop, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with Ben Taub Hospital, as well as his knowledge, if any, of Fred Harris' medical condition and care provide to him during the time in question.

Patton, Roshunda, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Perez, A., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO-IAD sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021, inmate incident reports relating to the events at issue in this lawsuit and HCSO IAD Report #DIC2021-00026.

Pham, Diem, LPHA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Price, Darla, HCSO, 1307 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). A medical and mental health records custodian for HCSO who is expected to testify that HCSO medical records relating to Fred Harris, including but not limited to all reports,

supplemental reports, medical notes and all other records, documents or media contained in said files are business records and records of regularly conducted activity within the meaning of the Federal Rules of Evidence.

Ramirez, A., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Ratcliff, H., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Reed, Melinda, LPHA, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Reyes, R.G., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). HCSO investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Roberson, Dominique, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Shorter, Logan, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal

investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Small, Arius, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Deputy who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Smith, P., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). HCSO sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Smith, Rosalyn, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Stauber, Jeffrey, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). HCSO Captain who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit. He may offer opinions regarding the actions of detention officer at the time in question. He may offer opinions that HCSO and Harris County do not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including Fred Harris. He may offer an opinion that no policy, custom or practice of Harris County or HCSO was the moving force behind nor the actual cause of the injuries to Fred Harris and that the training, supervision and discipline of HCSO officers is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

Stayton, Patrick, Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Jennifer Callan: 713-274-5146). HCDA attorney who may have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit under HCSO Offense Report #2110-12021 and Texas Rangers Report #2021I-TRA-50080441 as well as indictment #s 174561801010 and 174680501010.

Sunder, Laxman, M.D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Former Medical director of HCSO Health Services who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as his knowledge, if any, of Fred Harris and the events at issue in this lawsuit. He may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question. He may offer opinions that HCSO Health Services operates in accordance with the relevant medical standards and that the care provided to Fred Harris did not deviate from the relevant medical standard of care. He may offer an opinion that no policy or custom of Harris County was the moving force nor actual cause of Fred Harris' injuries and that the training and supervision of HCSO jail medical personnel is constitutionally sufficient, and that no alleged lack of training or supervision was the moving force behind any of Fred Harris' injuries.

Thomas, Tamica, LVN, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Nurse who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during his incarceration at Harris County jail.

Umfrid, M., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). Medical provider who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO Health Services, duties of medical personnel in a jail medical clinic, as well as her knowledge, if any, of Fred Harris and the events at issue in this lawsuit. She may offer opinions regarding the actions of the medical personnel when interacting with Fred Harris during the time in question.

Unknown staff, employees, representatives, agents, personnel and custodian of records for Ben Taub Hospital (a/k/a Harris Health System), 1504 Taub Loop, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). May have knowledge of Fred Harris' medical condition and/or injuries and the medical care provided to him at the time in question.

Unknown staff, employees, representatives, agents, personnel and custodian of records for Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Jennifer Callan: 713-274-5146). May have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit under HCSO Offense Report #2110-12021 and Texas Rangers Report #2021I-TRA-50080441 as well as indictment #s 174561801010 and 174680501010.

Unknown staff, employees, representatives, agents, personnel and custodian of records for Harris County Institute of Forensic Sciences, 1861 Old Spanish Trail, Houston, Texas 77030 (c/o Jennifer Callan: 713-274-5146). May have knowledge of the autopsy performed on Fred Harris, as recorded in Report #ML21-5126.

Unknown staff, employees, representatives, agents, personnel and custodian of records for HCSO, 1200 Baker, Houston, Texas 77002 (c/o Jennifer Callan: 713-274-5146). May have knowledge of the events at issue in this lawsuit.

Vickery, Jeffery, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). HCSO-IAD deputy who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021, inmate incident reports relating to the events at issue in this lawsuit and HCSO IAD Report #DIC2021-00026.

Washington, D., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). Detention officer who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Wolfe, Arnold, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). HCSO Lieutenant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit. He may offer opinions regarding the actions of detention officer at the time in question. He may offer opinions that HCSO and Harris County do not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including Fred Harris. He may offer an opinion that no policy, custom or practice of Harris County or HCSO was the moving force behind nor the actual cause of the injuries to Fred Harris and that the training, supervision and discipline of HCSO officers is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

Ybarra, L., HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713-2745146). Detention sergeant who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of detention officers to act in various situations within the jail, as well as his knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and inmate incident reports relating to the events at issue in this lawsuit.

Young, Natasha, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Jennifer Callan: 713274-5146). HCSO Staff Chaplain who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO, , as well as her

knowledge, if any, of the criminal investigation relating to HCSO Offense Report #2110-12021 and events at issue in this lawsuit.

B. Documents That Support Claims or Defenses (Rule 26(a)(1)(A)(ii)):

- (1) Photos/videos of Fred Harris and his family and friends
Fred Harris's school records
Fred Harris's medical records
Fred Harris's court records to which Harris County has equal or greater access
Plaintiff's court records to which Harris County as equal greater access
Plaintiff has receipts and records of expenses
HCIFS likely has the autopsy report but has not given a copy to Plaintiff
Harris County has the Texas Ranger's report but has not given Plaintiff a copy.
There is a video of the murder of Fred Harris in the custody and control of Harris County
The Harris County District Attorney has records in its prosecution of Ownby file and Fred Harris's file
- (2) Harris County alleges they will produce the following files and documents:
 - HCSO Offense Report #2110-12021
 - HCSO Internal Affairs File #DIC2021-00026
 - Fred Harris' jail file
- (3) Harris County produced a redacted copy of the Texas Attorney General Custodial Death Report #21-1499-CJ [bates #HC_F.Harris_000167-000172.
- (4) Harris County identified the following documents] that are in the possession, control and custody of third parties, which Defendant claims Plaintiff has equal access via subpoena, however, Plaintiff avers Harris County needs to produce these to Plaintiff:
 - Houston Fire Department Patient Care Report-Incident #2110291094
 - Texas Department of Public Safety Report #2021I-TRA-50080441
 - Houston Police Department Offense Report #136767721
 - The Harris Center for Mental Health and IDD
 - University of Texas Medical Branch
 - White Oaks Hospital

C. Calculation of each damage claims (Rule 26(a)(1)(A)(iii)):

Mental Anguish past and future to be determined by a jury: At least \$50,000,000.00.

Loss of enjoyment of life: At least \$25,000,000.00

Loss of companionship: At least \$25,000,000.00

Other wrongful death damages: At least \$25,000,000.00
Attorney's fees and expenses to be determined by the Lodestar method.
Funeral expenses around \$15,000.00.

D. Insurance agreements (Rule 26(a)(1)(A)(iv)):

Plaintiff has none.

Respectfully Submitted,

/s/ Randall L. Kallinen
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CERTIFICATE OF SERVICE

I certify I have served this filing on this 10TH day of December 2022, by filing with the Court's ECF System.

/s/ Randall L. Kallinen
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